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SR *nr*

Southern California Edison Company
L-00000A-06-0295-00130

May 29, 2006

Dear Chairman Gleason and Commissioners:

On behalf of the 2300 members of the Maricopa Audubon Society here in central Arizona, we would write to you to express our disapproval and opposition to the Certificate of Environmental Compatibility for the Devers to Palo Verde 2 Transmission Line Project.

Members of the Maricopa Audubon Society have traveled to the KOFA National Wildlife Refuge on our field trips to observe nature. Its plants, trees, desert vegetation, animals and birdlife are unique to that portion of the Sonoran Desert. It would be tragic to see a second power line violate the integrity and space of this important National Wildlife Refuge.

In our view this powerline is not in the broader public interest. This proposed line will bring little, if any, benefits to Arizona rate payers and in fact is likely to result in increased rates for Arizonans, while at the time doing significant environmental harm. The proposed line is clearly incompatible with the KOFA National Wildlife Refuge as was determined by the Refuge manager, and would also negatively impact other sensitive public lands in our state.

This transmission line is contrary to the National Wildlife Refuge System mission and would hinder the efforts of the Refuge staff to meet the mandates of that mission. A second power transmission line would further fragment and reduce the quality and quantity of habitats on the KOFA National Wildlife Refuge. By that standard alone the proposed new 500 KV line is incompatible with the mission of the Refuge.

The Right-of-Way through KOFA is through prime desert bighorn sheep and desert tortoise habitat. The potential effects of another power line on bighorn sheep, especially on movement across the power line right-of-way and during the lambing period, are clearly contrary to the purposes for which the refuge was established. Considering that the population of sheep in the area is estimated to be down to 390 animals, a drop of approximately 230 animals from 2003 and down from 812 animals in 2000, it is prudent to be cautious about introducing further disturbances.

We are concerned that migratory birds would strike the power lines. In addition, potential impacts to reptiles, either attempting to cross roads, or no longer able to cross the right-of-way because of its width, are a concern to our membership. These power lines are clearly contrary to the purposes of the refuge and its management mandates.

The line will also further obstruct the natural view of the area that is pristine desert landscape and clearly negatively affect the wilderness values of the Refuge. Visual impacts as well as recreational impacts on the KOFA National Wildlife Refuge would be significant and could not be mitigated. Adding additional industrial features to the landscape is a significant adverse visual change. The project would change the character of the KOFA and significantly diminish its recreational value as well.

The Final Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") on this proposed project indicates clearly that the impact of the DPV2 transmission line on the Kofa will be irreparable and unmitigable. According to the EIR/EIS, the negative visual impacts in the Kofa National Wildlife Refuge would be significant and unmitigable (page ES-41).

The project would change the character of the KOFA National Wildlife Refuge and significantly diminish its recreational value as well. On page D.5-22 of the Final EIR/EIS, it states:

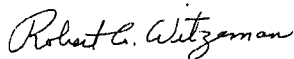
"Overall, development and operation of the project would change the character of the Kofa NWR and significantly diminish its recreational value. Impacts to the Kofa NWR would be significant and unmitigable (Class I)."

The Power Plant and Line Siting Committee was charged with reviewing a number of factors including the total environment of the area, fish, wildlife and plant life and associated forms of life upon which they are dependent, existing scenic areas, and more, and it is to "give special consideration to the protection of areas unique because of biological wealth or because they are habitats for rare and endangered species." There is no doubt that the KOFA is unique and should be given special consideration.

The DVP2 is unnecessary for an adequate, economical and reliable supply of electric power for Arizona and would cause significant damage to our precious Arizona public lands. It is clear that the benefits of this project to Arizona and to Arizona ratepayers are limited, at best, and that the environmental impacts are significant. Because of this, we strongly urge the Arizona Corporation Commission to reject the Certificate of Environmental Compatibility for the Devers to Palo Verde 2 Transmission Line.

Thank you for considering our comments.

Sincerely,



Robert A. Witzeman, M.D., Conservation Chair, 602 840-0052, witzeman@cox.net